

Michael Porter, P.C., OSB No. 003560

mike.porter@millernash.com

Erin M. Burris, OSB No. 155379

erin.burris@millernash.com

MILLER NASH LLP

US Bancorp Tower

111 SW Fifth Ave, Ste 3400

Portland, OR 97204

Telephone: 503.224.5858

Facsimile: 503.224.0155

Attorneys for Defendants
University of Portland and Megan Burton

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

RYANN GREGG,

Plaintiff,

v.

UNIVERSITY OF PORTLAND; MEGAN
BURTON; and JANE DOE,

Defendants.

CV No. 3:22-cv-01680-JR

DEFENDANTS UNIVERSITY OF
PORTLAND'S AND MEGAN BURTON'S
SECOND UNOPPOSED MOTION FOR
EXTENSION OF TIME TO REPLY TO
PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION TO DISMISS
AND SPECIAL ANTI-SLAPP MOTION TO
STRIKE PURSUANT TO ORS 31.150

LR 7-1 CERTIFICATION

Counsel for University of Portland and Megan Burton ("University Defendants"),

conferred with counsel for plaintiff Ryann Gregg about this motion requesting an extension of time to reply to Plaintiff's Response to Defendants' Motion to Dismiss and Special Anti-SLAPP

Page 1 - Defendants University of Portland's and Megan Burton's Second Unopposed Motion for Extension of Time to Reply to Plaintiff's Response to Defendants' Motion to Dismiss and Special Anti-SLAPP Motion to Strike Pursuant to ORS 31.150

Motion to Strike Pursuant to ORS 31.150 (“Plaintiff’s Response”). Plaintiff does not oppose University Defendants’ motion.

MOTION

In accordance with Fed R Civ P 6(b), and without waiver of any defense, the University Defendants move the court for an order extending the deadline in which to file and serve a reply to Plaintiff’s Response to February 24, 2023. The current deadline is February 17, 2023.

MEMORANDUM

Plaintiff filed Plaintiff’s Response on January 20, 2023, resulting in a deadline of February 3, 2023, for University Defendants to file a reply. University Defendants previously sought a two-week extension of the reply deadline to February 17, 2023, because counsel for University Defendants had deadlines in other matters, including for one attorney, a jury trial that began on January 30, 2023. That jury trial is still in progress and is likely to end on its 9th court day, and counsel for University Defendants additionally have competing deadlines in other matters. Therefore, in order to prepare a reply addressing the points raised in Plaintiff’s Response, University Defendants seek an additional one-week extension of the reply deadline to February 24, 2023. This is the second request for an extension of time by the University Defendants to reply to Plaintiff’s Response. This motion is not made for any improper purpose or to cause delay.

///

///

///

///

Page 2 - Defendants University of Portland’s and Megan Burton’s Second Unopposed Motion for Extension of Time to Respond to Plaintiff’s Response to Defendants’ Motion to Dismiss and Special Anti-SLAPP Motion to Strike Pursuant to ORS 31.150

CONCLUSION

For the reasons stated above, University Defendants respectfully request that the Court enter an order extending the deadline to file a reply to Plaintiff's Response to February 24, 2023.

DATED this 8th day of February, 2023.

MILLER NASH LLP

s/Erin M. Burris
Michael Porter, P.C.—Trial Attorney
OSB No. 003560
mike.porter@millernash.com
Erin M. Burris, OSB No. 155379
erin.burris@millernash.com
Phone: 503.224.5858
Fax: 503.224.0155

*Attorneys for Defendants University of Portland
and Megan Burton*

4888-3044-3599.1

Page 3 - Defendants University of Portland's and Megan Burton's Second Unopposed Motion for Extension of Time to Respond to Plaintiff's Response to Defendants' Motion to Dismiss and Special Anti-SLAPP Motion to Strike Pursuant to ORS 31.150